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19 *Michael Halprin*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 UNITED STATES OF AMERICA,

23 Plaintiff,

24 vs.

25 MICHAEL HALPRIN,

26 Defendant.

27 Case No.: 2:19-cr-00154-RFB-MDC

28 **JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR JANUARY
14, 2025**

29 IT IS HEREBY STIPULATED AND AGREED by and between JASON FRIERSON,
30 United States Attorney, District of Nevada, and NADIA AHMED and JACOB OPERSKALSKI,
31 Assistant United States Attorneys, representing the United States of America, and LOUIS
32 PALAZZO, NATHAN GARRETT, and LUCINDA LUETKEMEYER, representing Defendant
33 Michael Halprin, that the sentencing hearing scheduled for January 14, 2025, at 9:15 a.m., in the
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1 above-captioned matter, be vacated and continued to a date and time to be set by this Honorable
2 Court but no sooner than February 17, 2025.

3 This stipulation is entered into for the following reasons:

- 4 1. Sentencing in this matter is currently scheduled for January 14, 2025, at 9:15 a.m.
- 5 2. A Status Conference in this matter was held on September 10, 2024. During this
6 conference, the Court granted a Motion to Withdraw as Counsel filed by counsel for co-
7 defendant Eghomware Igbinovia, aka Jerry Igbinovia, (“Igbinovia”) and instructed CJA to
8 appoint new attorneys for Igbinovia.
- 9 3. On September 13, 2024, Federal Public Defender Heidi A. Ojeda was appointed as new
10 counsel for Igbinovia.
- 11 4. On September 16, 2024, Assistant Federal Public Defender Nisha Brooks-Whittington
12 entered her appearance as counsel for Igbinovia.
- 13 5. Counsel for Igbinovia and the government jointly moved to continue the calendar call
14 and trial date. Trial is now scheduled for January 13, 2025. Dkt. No. 416.
- 15 6. Defense counsel needs additional time to investigate issues relevant to sentencing and
16 prepare for sentencing.
- 17 7. Mr. Halprin has appeared in this case, and is not in custody and, along with the
18 government, agrees to this continuance.
- 19 8. The additional time requested herein is not sought for purposes of delay and the denial of
20 this request for a continuance could result in a miscarriage of justice.
- 21 9. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing
22 hearing for good cause. Good cause exists in this case.

1 10. Counsel for Defendant Michael Halprin and the government agree a continuance of the
2 sentencing hearing is in the best interests of justice.

3 11. For all the above-stated reasons, the ends of justice would be best served by the
4 continuance of the sentencing hearing.

5 This is the ninth request for a continuance of the sentencing hearing.

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9 DATED: November 20, 2024

10 /s/ Nathan F. Garrett
11 GRAVES GARRETT GREIM LLC
12 Nathan F. Garrett, *pro hac vice*
13 Lucinda H. Luetkemeyer, *pro hac vice*

14 PALAZZO LAW FIRM
15 A PROFESSIONAL LAW CORPORATION
16 T. Louis Palazzo, Esquire
17 *Counsel for Defendant Michael Halprin*

18 JASON FRIERSON
19 United States Attorney
20 By /s/ Jacob Operksalski
21 Jacob Operksalski
22 Assistant United States Attorney

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
MICHAEL HALPRIN,
Defendant.

Case No.: 2:19-cr-00154-RFB-MDC

**JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR JANUARY
14, 2025**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Sentencing in this matter is currently scheduled for January 14, 2025, at 9:15 a.m.
2. Defense counsel needs additional time to investigate issues relevant to sentencing and prepare for sentencing.
3. Mr. Halprin has appeared in this case, and is not in custody and, along with the government, agrees to this continuance.
4. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.
5. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing hearing for good cause. Good cause exists in this case.

For all of the above-stated reasons, the ends of justice would best be served by an order vacating the current sentencing hearing date and continuing the sentencing hearing date no sooner than February 17, 2025.

1 **ORDER**
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7 IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for January 14,
8 2025, at the hour of 9:15 a.m., be vacated and continued to **March 10, 2025 at 9:15 a.m.**
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Dated this the 21st day of November, 2024.



THE HONORABLE RICHARD F. BOULWARE
UNITED STATES DISTRICT JUDGE